

Exhibit 13

1 John Farrell

2 43 for almost three years.

3 A. I can't remember the exact amount
4 of time I was in these places. I remember being
5 in them. The exact amount of times, you know, I
6 moved around a lot in the police department.

7 Q. I appreciate that these events
8 happened quite a long time ago, and I'm only
9 asking you to do the best you can with whatever
10 memory you have.

11 A. That's fine.

12 Q. But I do want to, you know, from
13 time to time, I'll press you a little bit to see
14 if I can get a more exact memory of it.

15 Do you remember approximately what
16 year it was that you went to the Manhattan DA's
17 Squad?

18 A. 1981, approximately 1981.

19 Q. How long were you in the Manhattan
20 DA's Squad?

21 A. I was in the Manhattan DA's Squad
22 until 1986, I believe, and then I went to the
23 19th Detective Squad.

24 Q. How long were you there?

25 A. A very short time, and then I went

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2 to the Manhattan South Task Force, Detective
3 Task Force on Night Watch.

4 Q. On Night Watch, all right. So the
5 Night Watch was part of the Manhattan South Task
6 Force Detective Squad?

7 A. Yes.

8 Q. Approximately what year did you go
9 to Night Watch, if you can remember?

10 A. I said I believe it was 1986.

11 Q. '86, all right. And is that the
12 position you were in when you retired?

13 A. Yes.

14 Q. During your time in the Manhattan
15 DA's Squad, which was approximately what, five
16 years, 1981 to 1986?

17 A. Yes.

18 Q. Were there any particular cases
19 that you were assigned to work on?

20 A. I worked on everything, organized
21 crime, white collar crime and anything that the
22 DA's office decided to investigate.

23 Q. Did you work on any sex crimes
24 cases?

25 A. No, I don't believe I did, no.

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2 Q. Did you work on any homicides when
3 you were in the DA's Squad?

4 A. I don't believe I did while on the
5 DA's Squad, no.

6 Q. During the time you were assigned
7 to the Manhattan DA's Squad, did you know Linda
8 Fairstein?

9 A. Yes.

10 Q. And did you work on cases with her
11 during the time you were in the Manhattan --

12 A. District Attorney's.

13 Q. -- DA's Squad?

14 A. I don't recall.

15 Q. How did you know her?

16 A. She was a sex crimes prosecutor for
17 the DA's office.

18 Q. During that entire period of time
19 you were there?

20 A. I believe so. I'm not sure if she
21 left before me or after me. I didn't keep track
22 of her. I don't know.

23 Q. Do you recall whether you actually
24 worked on a case with her though?

25 MR. MYERBERG: Objection.

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2 A. I don't recall. I know I've worked
3 on cases with other people that might have
4 worked on cases with her. But that's the way it
5 was in the DA's Squad, they tell you to go out
6 and help someone.

7 Q. File your report and go on to the
8 next one?

9 A. Yes.

10 Q. Did you know Elizabeth Lederer?

11 A. Yes.

12 Q. Do you recall ever working on any
13 cases with her?

14 A. I've seen her a few times, so I
15 believe maybe I did. I'm not sure.

16 Q. Before April of 1989?

17 A. I'm not really sure.

18 Q. But you think you may have worked
19 on some matters with her before then?

20 MR. MYERBERG: Objection.

21 A. I'm not positive.

22 Q. I'm not asking you to be positive.
23 But you think you might have worked on some
24 cases with her, right?

25 A. I don't know.

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2 Q. What about an Assistant District
3 Attorney named Nancy Ryan, do you know her? Did
4 you know her when you were in the squad?

5 A. I don't remember the name, no.

6 Q. Is this the first time you're
7 hearing her name?

8 MR. MYERBERG: Objection. Are you
9 saying outside the presence of counsel? I
10 mean, is that the question? If it is, it's
11 privileged.

12 Q. I'm sorry, outside of the presence
13 of any conversations you may have had with any
14 of your lawyers, have you ever heard her name
15 before?

16 A. I don't recall hearing her name
17 before.

18 Q. What about a District Attorney
19 named Peter Casolaro, did you ever work with
20 him?

21 A. I never heard of him.

22 Q. You never heard of him, all right.

23 How about a District Attorney named
24 Harlan Levy, did you ever work with him when you
25 were in the DA's Squad?

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